

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

21 CV 11138

Gennadiy N. Ulanov

Write the full name of each plaintiff.

CV

(Include case number if one has been assigned)

-against-

New York State Board  
of Elections

COMPLAINT

Do you want a jury trial?

☐ Yes ☒ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

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CLERK OF COURT  
2021 DEC 29 PM 2:38

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☐ Federal Question

☒ Diversity of Citizenship

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

Electoral rights

### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Gennadiy N Ulanov, is a citizen of the State of  
(Plaintiff's name)

US citizen

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of \_\_\_\_\_  
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_

If the defendant is a corporation:

The defendant, New York State Board of Elections, is incorporated under the laws of the State of \_\_\_\_\_

and has its principal place of business in the State of \_\_\_\_\_

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in \_\_\_\_\_

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

<u>Gennadiy</u>	<u>N</u>	<u>URANOV</u>
First Name	Middle Initial	Last Name
<u>14 CASS PL apt 6D</u>		
Street Address		
<u>Brooklyn</u>	<u>NY</u>	<u>11235</u>
County, City	State	Zip Code
<u>(347) 254-3480</u>	<u>ATOIABC@gmail.com</u>	
Telephone Number	Email Address (if available)	

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

First Name	Last Name
Current Job Title (or other identifying information)	
Current Work Address (or other address where defendant may be served)	
County, City	State Zip Code

Defendant 2:

First Name	Last Name
Current Job Title (or other identifying information)	
Current Work Address (or other address where defendant may be served)	
County, City	State Zip Code

Defendant 3:

First Name	Last Name
Current Job Title (or other identifying information)	
Current Work Address (or other address where defendant may be served)	
County, City	State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

**III. STATEMENT OF CLAIM**

Place(s) of occurrence: Bay Academy - 15 98-1401 Emmons Avenue  
Brooklyn NY

Date(s) of occurrence: November 4, 2020

**FACTS:**

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

On November 4, 2020, at about 1 p.m., I arrived  
at the polling station at Bay Academy - 15  
98-1401 Emmons Avenue, and I was fifth or sixth  
in line to vote. Standing in line, I began to look  
at the polling station and the voting process  
There are three voting machines: A, B, & C. My  
attention was attracted by the fact that from  
the car C people were sent to cars A and B.  
I thought that car C was out of order.  
But when the observer walked away from  
car C some voters managed to vote on car C.  
So the car is working, but what's the matter?  
I started to examine the car and the reason  
became clear - the car was not sealed, there were no seals.

I took out my phone, photographed and filmed, and asked why not sealed?

The members of the Election Commission tried to cover the car with themselves, but according to their actions it was. It can be seen that they know about the absence of a seal and that this is a violation.

At about 5pm I went to the site again, all the cars were sealed. I have no right to draw any conclusions, but a well-organized violation is evident

#### INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

My rights and thousands of voters have been violated

#### IV. RELIEF

State briefly what money damages or other relief you want the court to order.


\$ 3000 000.00

**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

<u>12.29.2021</u>		<u></u>
Dated		Plaintiff's Signature
<u>Gennadiy</u>	<u>N</u>	<u>Ulanov</u>
First Name	Middle Initial	Last Name
<u>14 case PL apt 6D</u>		
Street Address		
<u>Brooklyn</u>	<u>NY</u>	<u>11235</u>
County, City	State	Zip Code
<u>(347) 254-3480</u>	<u>ATO KBC@gmail.com</u>	
Telephone Number	Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

On November 4, 2020, at about 1 p.m., I arrived at the polling station at Bay Academy-IS 98-1401 Emmons Avenue, and I was fifth or sixth in line to vote. Standing in line, I began to look at the polling station and the voting process. There are three

Voting machines: A, B, C, my attention was attracted by the fact that from the car C people were sent To cars A and B. I thought that car C was out of order. But when the observer walked away from car C, some voters managed to vote on

Car C, So the car is working, but what's the matter? I started to examine

The car and the reason became clear - the car was not sealed, there were no seals.

I took out my phone, photographed and filmed and asked why not sealed?

The members of the election commission tried to cover the car with themselves, but according to their actions it was

It can be seen that they know about the absence of a seal and that this is a violation.

At about 5 pm I went to the site again, all the cars were sealed.

I have no right to draw any conclusions, but a well-organized violation is evident.

And the culprit is the New York Election Commission and personally the chairman

My rights and thousands of voters have been violated



